

# **EXHIBIT 7**

**FILED UNDER SEAL**

**From:** Cole Richter <richter@ls3ip.com>  
**Sent:** Friday, December 16, 2022 4:57 PM  
**To:** Marc Kaplan  
**Cc:** QE-Sonos3; Sonos-NDCA06754-service  
**Subject:** RE: Sonos/Google -- NDCA2  
**Attachments:** EX. C - 10,469,966 - Supplemental Infringement Contention Chart [redline].pdf

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Marc,

Following up on the below. Additionally, attached is Sonos's proposed amendment to the '966 infringement chart.

Best,  
Cole

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**From:** Cole Richter  
**Sent:** Tuesday, December 13, 2022 9:43 AM  
**To:** Marc Kaplan <marckaplan@quinnemanuel.com>  
**Cc:** QE-Sonos3 <qe-sonos3@quinnemanuel.com>; Sonos-NDCA06754-service <Sonos-NDCA06754-service@orrick.com>  
**Subject:** RE: Sonos/Google -- NDCA2

Marc,

[REDACTED] Please let us know Google's position on Sonos amending the contentions to include the substance from these paragraphs.

[REDACTED]

[REDACTED]

You did not respond to our request for a knowledgeable witness. Are we at an impasse on this issue too?

Best,  
Cole

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**From:** Marc Kaplan <[marckaplan@quinnemanuel.com](mailto:marckaplan@quinnemanuel.com)>  
**Sent:** Wednesday, December 7, 2022 12:51 PM  
**To:** Cole Richter <[richter@ls3ip.com](mailto:richter@ls3ip.com)>  
**Cc:** QE-Sonos3 <[qe-sonos3@quinnemanuel.com](mailto:qe-sonos3@quinnemanuel.com)>; Sonos-NDCA06754-service <[Sonos-NDCA06754-service@orrick.com](mailto:Sonos-NDCA06754-service@orrick.com)>  
**Subject:** Re: Sonos/Google -- NDCA2

Cole,

Thank you for informing us that Sonos intends to move for leave to amend its infringement contentions for the '966 patent. It is not clear to us what you mean when you say that the substance of the amendments would be taken from the paragraphs of Dr. Almeroth's 11/30 report that address Google's non-infringing alternatives, so please send us a copy of Sonos's proposed amendment so that we can evaluate it.

With respect to your other email from Friday, you raised a few different but related issues. [REDACTED]

[REDACTED]

Thank you,  
Marc

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**From:** Cole Richter <[richter@ls3ip.com](mailto:richter@ls3ip.com)>  
**Date:** Monday, December 5, 2022 at 4:30 PM  
**To:** Marc Kaplan <[marckaplan@quinnemanuel.com](mailto:marckaplan@quinnemanuel.com)>  
**Cc:** QE-Sonos3 <[qe-sonos3@quinnemanuel.com](mailto:qe-sonos3@quinnemanuel.com)>, Sonos-NDCA06754-service <[Sonos-NDCA06754-service@orrick.com](mailto:Sonos-NDCA06754-service@orrick.com)>  
**Subject:** Sonos/Google -- NDCA2

[EXTERNAL EMAIL from [richter@ls3ip.com](mailto:richter@ls3ip.com)]

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Marc,

Sonos intends to move for leave to amend its infringement contentions for the '966 patent to allege that Google's "new version of its source code" meets the elements of the '966 Asserted Claims. [REDACTED]

[REDACTED]

Please let us know if Google is opposed or unopposed. If opposed, please let us know a time before Wednesday when we can confer.

For the avoidance of doubt, Sonos reserves the right to seek further leave to amend in view of additional discovery on Google's [REDACTED]

Best,

**Cole B. Richter**



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